

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and AMAZON TECHNOLOGIES, INC., a Nevada Corporation,

Plaintiffs,

v.

DIGITAL HOME SOLUTIONS LLC, a Georgia corporation; JOTI APLEE DHILLON, an individual; and DOES 1-50, unknown individuals and entities,

Defendants.

Civil Action No.: 1:23-cv-5175-ELR

**CONSENT MOTION TO STAY OR EXTEND TIME
FOR DEFENDANTS TO RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants Digital Home Solutions LLC and Joti Aplee Dhillon (collectively, "Defendants") move the Court to extend the time in which Defendants may timely answer, move, counterclaim, or otherwise plead in response to Plaintiffs Amazon.com, Inc.'s, Amazon.com Services LLC's, and Amazon Technologies, Inc.'s (collectively, "Plaintiffs" or "Amazon") Complaint, up to and including January 17, 2024.

Counsel for the parties have conferred and Plaintiffs consent to this request for an extension.

Accordingly, Defendants request that the Court enter an order extending the deadline to respond to the Complaint through and including January 17, 2024.

Respectfully submitted this 5th day of December, 2023.

DAVIS WRIGHT TREMAINE LLP

LEXERO LLC

/s/ Bonnie E. MacNaughton

Bonnie E. MacNaughton*

Jaime Drozd*

920 Fifth Avenue, Suite 3300

Seattle, WA 98104

Phone: (206) 622-3150

Fax: (206) 757-7700

bonniemacnaughton@dwt.com

jaimedrozd@dwt.com

/s/ Eric Menhart (with express permission)

Eric Menhart*

512 C. St. NE

Washington, DC 20002

Phone: (855) 453-9376

Fax: (855) 453-9376

eric.menhart@lexero.com

**pro hac vice forthcoming*

**pro hac vice*

Attorney for Defendants

ROBBINS ALLOY BELINFANTE
LITTLEFIELD LLC

/s/ Craig G. Kunkes

Craig G. Kunkes

Georgia Bar No. 963594

Michael D. Forrest

Georgia Bar No. 974300

500 14th Street, NW

Atlanta, Georgia 30318

Phone: (678) 701-9381

ckunkes@robbinsfirm.com

mforrest@robbinsfirm.com

Attorneys for Plaintiffs

L.R. 7.1(D) CERTIFICATION

I certify that this Motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 14-pt Times New Roman Font.

/s/ Craig G. Kunkes

Craig G. Kunkes

Georgia Bar No. 963594

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing
**CONSENT MOTION TO STAY OR EXTEND TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFFS' COMPLAINT** with the Clerk of Court using
the CM/ECF system, which will send e-mail notification of such filing to counsel
of record.

This 5th day of December, 2023.

/s/ Craig G. Kunkes
Craig G. Kunkes